

Mr. Kelly Russell  
Jasper Wood Products Co., Inc.  
500 East 13<sup>th</sup> Street  
Jasper, Indiana 47547-0271

Dear Mr. Russell:

Re: Exempt Construction and Operation Status of  
units in a Title V source  
037-12979-00106

The application from Jasper Wood Products Co., Inc., received on November 17, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following equipment, to be located at 13<sup>th</sup> & Leopold Streets, Jasper, Indiana, is classified as exempt from air pollution permit requirements:

One (1) touch-up parts spray booth, equipped with HVLP spray guns, using 0.303 gallons per day of coating and exhausting through dry filters for overspray control.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (a) Opacity shall not exceed an average of forty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the touch-up parts spray booth shall be limited to 0.03 grain per dry standard cubic foot.
- (3) Pursuant to 326 IAC 8-2-12, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture shall utilize one of the following application:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(4) General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

(5) Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or

(C) Use a control device to limit emissions; or

(D) Use a combination of (A), (B), or (C).

(2) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.

or

- (C) Use a control device to limit emissions.

(3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

(6) Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line Cleaning.
- (i) Gun Cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

(7) Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63, Subpart JJ]

Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, subpart JJ and 326 IAC 3-6.

(8) Record Keeping Requirements

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of dates used;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) The Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition 5 of this permit.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition 6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

This existing source has submitted their Part 70 application (T 037-7485-00106) on December 11, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Dubois County  
Dubois County Health Department  
Air Compliance - Ray Schick  
Soutwest Regional Office  
Permit Administration & Development Section - Janet Mobley  
Technical Support & Modeling-Michele Boner  
Compliance Data Section-Karen Nowak  
Part 70 Application File - T-037-7485-00106

**Indiana Department of Environmental Management (IDEM)**  
**Office of Air Quality**

Technical Support Document (TSD) for Exempt Emission Unit(s)  
in a Title V Source

**Source Background and Description**

Source Name: Jasper Wood Products Co., Inc.  
Source Location: 13<sup>th</sup> & Leopold Streets, Jasper, Indiana 47547  
County: Dubois  
Permit No.: 037-112979-00106  
SIC Code: 2430  
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed an application from Jasper Wood Products Co., Inc. relating to the operation of wood furniture manufacturing:

One (1) touch-up parts spray booth, equipped with HVLP spray guns, using 0.303 gallons per day of coating and exhausting through dry filters for overspray control.

**Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information supplied by the applicant.

An application for the purposes of this review was received on November 17, 2000.

**Potential to Emit**

Pollutant	Potential Emissions
	(ton/yr)
PM	0.07
SO <sub>2</sub>	0
VOC	8.73
CO	0
NO <sub>x</sub>	0
Single HAP	0.46
Combination of HAPs	0.46

The potential VOC emissions before control are less than are less than 10 tons per year. Therefore, pursuant to 326 IAC 2-1.1-3(d), this modification is exempt.

**County Attainment Status**

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the

formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Dubois County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## **Part 70 Permit Determination**

### **326 IAC 2-7 (Part 70 Permit Program)**

This existing source has submitted their Part 70 application (T037-7485-00106) on December 11, 1996. The equipment being reviewed under this permit shall be incorporated into the submitted Part 70 application.

## **Federal Rule Applicability**

### **40 CFR Part 60 (New Source Performance Standard (NSPS))**

There are no NSPS rules (40 CFR Part 60) applicable to the operation of the spray booth and spray guns.

### **40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants (NESHAPs))**

There are no NESHAP rules (40 CFR Part 63) applicable to the operation of the spray booth and spray guns. However, the entire source is greater than 10 tpy for single HAP and greater than 25 tpy for combined HAPs, so the touch-up spray booth must comply with 40 CFR Part 63, Subpart JJ as follows:

### **General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]**

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

### **Wood Furniture NESHAP [40 CFR 63, Subpart JJ]**

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
  - (1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent

maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or

(C) Use a control device to limit emissions; or

(D) Use a combination of (A), (B), or (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.

or

(C) Use a control device to limit emissions.

(3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

#### Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line Cleaning.
- (i) Gun Cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

#### State Rule Applicability

##### 326 IAC 5-1-2 (Visible Emission Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:



- (a) Opacity shall not exceed an average of forty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations)**

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the woodworking facilities shall be limited to 0.03 grain per dry standard cubic foot.

**326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)**

This source is subject to 326 IAC 8-2-12, because it has the potential to emit fifteen (15) pounds per day of VOC. Pursuant to the rule, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, the surface coating applied to wood furniture shall utilize one of the following application:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The source uses HVLP, therefore, the source is in compliance with this rule

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Construction Permit Application Form Y. None of these listed air toxics will be emitted from this proposed construction.

**Conclusion**

The construction of this the spray booth and spray guns will be subject to the conditions of the attached proposed Exemption No. 037-12979, Plt ID No. 037-00106.